

Kenneth Parreno

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Cc: Nina Perales <nperales@MALDEF.org>; Fatima Menendez <fmenendez@MALDEF.org>; Samantha Serna <sserna@MALDEF.org>;

Good evening,

I am writing to meet and confer regarding the missing privilege log associated with the production of documents in response to subpoenas served on the following individuals:

1. State Rep. Mike Schofield
2. State Sen. Donna Campbell
3. State Sen. Paul Bettencourt
4. State Sen. Brian Birdwell
5. State Sen. Bryan Hughes
6. State Sen. Robert Nichols
7. State Sen. Jane Nelson
8. State Sen. Charles Perry

On April 26, 2022, LULAC Plaintiffs served document subpoenas on these individuals (the "Legislators") through their counsel. On May 26, 2022, counsel for the Legislators produced some documents to LULAC Plaintiffs in response to those document subpoenas. Pursuant to the parties' Stipulated ESI Agreement, the privilege log in connection with that production was due Monday, June 27, 2022. *See* Dkt. 203 at 16. However, LULAC Plaintiffs have not yet received a privilege log, despite the Legislators potentially asserting, among other things, the legislative privilege, the deliberative-process privilege, the attorney-client privilege, and the work product doctrine.

Accordingly, this email constitutes an attempt to confer on the Legislators' missing privilege log. Please ensure that a privilege log for the Legislators is produced by July 1, 2022 so that LULAC Plaintiffs can assess the propriety of the privileges asserted by the Legislators.

Thank you,  
Kenneth

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